

**Bennett, Giuliano, McDonnell & Perrone, LLP**  
**Attorneys for Defendant Fernando Torres-Negrón**  
**225 West 34th Street, Suite 402**  
**New York, New York 10122**  
**Telephone: (646) 328-0120**  
**Fax: (646) 328-0121**  
**William R. Bennett, III (WB 1383)**

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

-----X  
FELIPE ROBLES VÁSQUEZ p/k/a RALDY  
VÁSQUEZ and CAMPESINO MUSIC  
ENTERTAINMENT GROUP, INC.,

NO. 06 CV 0619  
(Mc Mahon)

Plaintiffs,

-against-

**ANSWER**

FERNANDO TORRES-NEGRÓN,

Defendants

-----X

Defendant, Fernando Torres-Negrón, by and through his attorneys, Bennett, Giuliano, McDonnell & Perrone, LLP, as and for his Answer to the Complaint, states as follows:

1. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of the Complaint.
2. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of the Complaint.
3. Admits the allegations contained in paragraph 3 of the Complaint.
4. Pursuant to a stipulation by the parties, Tamara Sosa Pascual is no longer a party to the litigation and, accordingly, no response to paragraph 4 of the Complaint is required.

5. Pursuant to a stipulation by the parties, Jose De LaRye-Rive is no longer a party to the litigation and, accordingly, no response to paragraph 5 of the Complaint is required.

**Jurisdiction and Venue**

6. There are no factual allegations contained in paragraph 6 of the Complaint. Issues of law will be decided by the Court.

7. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of the Complaint.

8. There are no factual allegations contained in paragraph 8 of the Complaint. Issues of law will be decided by the Court.

**COUNT I**

9. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of the Complaint.

10. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Complaint.

11. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 of the Complaint.

12. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of the Complaint.

13. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 of the Complaint.

14. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 14 of the Complaint.

15. Admits the allegations contained in paragraph 15 of the Complaint.
16. Admits the allegations contained in paragraph 16 of the Complaint.
17. Admits the allegations contained in paragraph 17 of the Complaint.
18. Admits the allegations contained in paragraph 18 of the Complaint.
19. Admits the allegations contained in paragraph 19 of the Complaint.
20. Admits the allegations contained in paragraph 20 of the Complaint.
21. Admits the allegations contained in paragraph 21 of the Complaint.
22. Admits the allegations contained in paragraph 22 of the Complaint.
23. Admits the allegations contained in paragraph 23 of the Complaint.
24. Denies the allegations contained in paragraph 24 of the Complaint.
25. Admits the allegations contained in paragraph 25 of the Complaint.
26. Admits the allegations contained in paragraph 26 of the Complaint.
27. Admits the allegations contained in paragraph 27 of the Complaint.
28. Admits the allegations contained in paragraph 28 of the Complaint.
29. Admits the allegations contained in paragraph 29 of the Complaint.
30. Admits the allegations contained in paragraph 30 of the Complaint.
31. Admits the allegations contained in paragraph 31 of the Complaint.
32. Admits the allegations contained in paragraph 32 of the Complaint.
33. Admits the allegations contained in paragraph 33 of the Complaint.
34. Admits the allegations contained in paragraph 34 of the Complaint.
35. Admits the allegations contained in paragraph 35 of the Complaint.
36. Admits the allegations contained in paragraph 36 of the Complaint.
37. Admits the allegations contained in paragraph 37 of the Complaint.

38. Denies the allegations contained in paragraph 38 of the Complaint.

39. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 39 of the Complaint.

40. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 40 of the Complaint.

41. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 41 of the Complaint.

42. Admits the allegations contained in paragraph 42 of the Complaint.

43. Denies each and every allegation contained in paragraph 43 of the Complaint.

44. Denies each and every allegation contained in paragraph 44 of the Complaint.

45. Denies each and every allegation contained in paragraph 45 of the Complaint.

46. Denies each and every allegation contained in paragraph 46 of the Complaint.

47. Denies each and every allegation contained in paragraph 47 of the Complaint.

48. Denies each and every allegation contained in paragraph 48 of the Complaint.

49. Denies each and every allegation contained in paragraph 49 of the Complaint.

50. Denies each and every allegation contained in paragraph 50 of the Complaint.

51. Admits the allegations contained in paragraph 51 of the Complaint.

52. Denies each and every allegation contained in paragraph 52 of the Complaint.

53. Denies each and every allegation contained in paragraph 53 of the Complaint.

54. Denies each and every allegation contained in paragraph 54 of the Complaint.

55. Denies each and every allegation contained in paragraph 55 of the Complaint.

**FIRST AFFIRMATIVE DEFENSE**

1. The Complaint fails to state a cause of action upon which relief may be granted.

**SECOND AFFIRMATIVE DEFENSE**

2. Service of process of the Complaint was insufficient.

**THIRD AFFIRMATIVE DEFENSE**

3. Process was insufficient.

**FOURTH AFFIRMATIVE DEFENSE**

4. Venue of this action is improper.

**FIFTH AFFIRMATIVE DEFENSE**

5. The Court lacks in personam jurisdiction over the defendant.

**SIXTH AFFIRMATIVE DEFENSE**

6. Compansino Entertainment Group Inc. lacks standing.

**SEVENTH AFFIRMATIVE DEFENSE**

7. Plaintiffs' claims are time barred by applicable statute of limitations.

WHEREFORE, defendant Fernando Torres-Negrón requests that the action be dismissed, and that he be awarded costs and fees and any such further relief the Court deems just.

Dated: June 20, 2006  
New York, New York

Bennett, Giuliano, McDonnell & Perrone, LLP  
Attorneys for Defendant, Fernando Torres-Negrón

---

William R. Bennett, III  
225 West 34<sup>th</sup> Street, Suite 402  
New York, New York 10122  
Telephone: (646) 328-0120